

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

VIDEOSHARE, LLC,

Plaintiff,

v.

FACEBOOK, INC.

Defendant.

CIVIL ACTION NO. 6:21-CV-00254-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order (Dkt. 36), Plaintiff VideoShare, LLC and Defendant Facebook, Inc. submit this Joint Claim Construction Statement.

I. AGREED-UPON CLAIM TERMS

Term	Agreed Construction
“first client”	“sharing device/user”
“second client”	“viewing device/user”
“the identified video content”	“plain and ordinary meaning where the plain and ordinary meaning means that the ‘identified video content’ must have a corresponding identifier”

II. DISPUTED CLAIM TERMS

Claim Term	Plaintiff’s Construction	Defendant’s Construction
“depending on a compatibility of the second server system or a compatibility of the second client with the first format or the second format”	“after determining which of the first format or second format is most compatible with the second server system or the second client”	“after determining which of the first format and second format is most compatible with the second server system or the second client”
“server system”	Plain and ordinary meaning	Indefinite

Dated: December 20, 2021

/s/ William D. Ellerman

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on December 20, 2021.

/s/ William D. Ellerman
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